

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

vs.

FORTINET, INC.,

Defendant.

Case No. 2:22-cv-00322-JRG

**JURY TRIAL DEMANDED**

**DECLARATION OF WILLIAM COOPER IN SUPPORT OF  
DEFENDANT FORTINET, INC.'S MOTION TO TRANSFER**

1. My name is William Cooper. I am employed by Fortinet, Inc. ("Fortinet") as its Senior Vice President of Litigation and Compliance. I have been an employee and in-house attorney for Fortinet since October 16, 2017. Prior to joining Fortinet, I represented the company as outside counsel.

2. My duties include in-house legal representation of Fortinet across a broad range of legal disciplines, with an emphasis on intellectual property and litigation matters.

3. I reside in Truckee, California, and I work at Fortinet's headquarters in Sunnyvale, California.

4. The facts set forth in this declaration are based on my personal knowledge from the performance of my responsibilities for Fortinet, information contained in the business records of Fortinet, and discussions I had with other Fortinet personnel with such knowledge, and have been confirmed through further discussions with Fortinet personnel. If called as a witness, I could and would testify competently to the substance of this declaration.

5. Founded in 2000, Fortinet's principal place of business and headquarters are in Sunnyvale, California.

6. The majority of Fortinet's U.S. employees devoted to engineering, finance, operations, manufacturing, and marketing typically work in the Northern District of California.

7. Similarly, the majority of Fortinet's U.S. employees who research, design, develop, and market products, including those with knowledge of the accused products mentioned below, typically work in the Northern District of California. Further, Fortinet has a U.S. Manufacturing Assembly and Operations Center in northern California.

8. I understand that across the Patents-in-Suit, Plaintiff listed numerous Fortinet products in its original and purported amended infringement contentions, and that there is a dispute as to the products properly accused in the case. I understand that Plaintiff purported to chart only certain Fortinet products in its original infringement contentions: FortiWeb Cloud, the FortiADC appliance (specifically charting FortiADC 7.0.2 running on the FortiADC 5000F appliance), and the FortiGate appliance (specifically charting the FortiGate-7060E running FortiGate/FortiOS 6.0 and the FortiGate 7121F). I will refer to these charted products as the "accused products."

9. Alex Samonte, Fu Liu, and Fulei Deng have knowledge regarding the design, development, and functionality of accused products; Rodney Mock has knowledge regarding competitive analysis of the accused products; Jenny Ning has knowledge regarding source code for certain of the accused products; and Jim Bray has knowledge regarding the financials related to the accused products, and these employees work in Northern California.

10. Further, Fortinet's senior management in the United States, including its founders, CEO, CTO, CMO, and decision-makers related to the accused products, are in the Northern District of California.

11. Additional Fortinet employees outside of the United States who research, design, and develop products, including those with knowledge of the accused products, work in the Vancouver area, British Columbia, Canada.

12. Bob Zhu has knowledge regarding Fortinet's source code management for certain of the accused products, and Jeff Crawford has knowledge of Fortinet's project management, document management, and product tracking system (known as, "Product Management Database" or "PMDB"), which includes information regarding the accused products, and these employees work in the Vancouver area.

13. A large volume of the documents in the United States and relevant to trial, including those regarding the design, development, commercialization, and marketing of the accused products, are located on servers in or near Sunnyvale in the Northern District of California.

14. Source code and a second main source of documents related to the accused products are stored on servers in or near Vancouver.

15. To the extent Fortinet employees have physical copies of documents or local copies saved electronically, those documents are in the possession of the employee in their respective locations, e.g., Sunnyvale or the Vancouver area.

16. Fortinet has only a single office in Texas (in Plano), and the employees in this office have roles related to business development, sales, and customer support.

17. Also, to my knowledge, no product or source code development relating to the accused products takes place or is located in this office.

18. To the extent any employee in the Plano office may have knowledge or documents relevant to the accused products, such knowledge or documents are likely non-unique and

cumulative of information and documents possessed by Fortinet employees in Northern California or the Vancouver area.

19. The disruption to Fortinet's business activities should its employees appear for trial, hearings, or other proceedings will be significantly increased if they have to travel to the Eastern District of Texas rather than the Northern District of California.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 7<sup>th</sup> day of February 2023, in Truckee, California.

  
\_\_\_\_\_  
William Cooper